

AARON D. FORD  
Attorney General  
DOUGLAS R. RANDS, Bar No. 3572  
Senior Deputy Attorney General  
State of Nevada  
100 N. Carson Street  
Carson City, NV 89701-4717  
Tel: (775) 684-1150  
E-mail: drands@ag.nv.gov

*Attorneys for Defendants  
Robert Ashcraft, Stacy Barrett,  
Wilson Bernales, Samuel Emil,  
Javier Garcia, Benito Gutierrez,  
Sandra Gobler, Robert Jarrett,  
Calvin Johnson, Edgar Lopez-Maya,  
Jose Martinez, Justin McRoberts,  
Michael Minev, William Oblak,  
Dean Ontiveros, Ellery Rayford,  
David Rivas, Glenda Stewart,  
Roberto Valle, and Fred Zabel*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

S. SEANAH DIXON,

Plaintiff,

vs.

STACY BARRETT, et al.,

Defendants.

Case No. 2:22-CV-01412-APG-DJA

**STIPULATION TO CONTINUE JOINT  
PRETRIAL ORDER DEADLINE**

Plaintiff S. Seanah Dixon, by and through counsel, Tayler D. Bingham of the law firm Bailey❖Kennedy and Defendants Robert Ashcraft, Stacy Barrett, Wilson Bernales, Samuel Emil, Javier Garcia, Benito Gutierrez, Sandra Gobler, Robert Jarrett, Calvin Johnson, Edgar Lopez-Maya, Jose Martinez, Justin McRoberts, Michael Minev, William Oblak, Dean Ontiveros, Ellery Rayford, David Rivas, Glenda Stewart, Roberto Valle, and Fred Zabel by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Douglas R. Rands, Senior Deputy Attorney General, hereby stipulate to request the Court continue the Joint Pretrial Order deadline scheduled for January 10, 2025.

///

///

The parties have settled this matter. However, the terms of the settlement relate to medical care and procedures, and the parties have some disagreement as to whether the medical procedures provided meet the expectations of the parties as provided in the settlement agreement. There may be new medical appointments necessary to complete the settlement, that cannot be completed prior to the current deadline. The parties feel that their resources would be better spent on trying to resolve the claim, than continuing the litigation process.

The parties agree that this is a valid and good faith reason for a continuance of the time to file the Joint Pretrial Order. Therefore, the parties respectfully request this Court continue the deadline for filing the Joint Pretrial Order, scheduled for January 10, 2025, for 60 days to **March 11, 2025**.

DATED this 9th day of January, 2025

DATED this 9th day of January, 2025

BAILEY ♦ KENNEDAY

AARON D. FORD  
Attorney General

By: /s/ Tayler D. Bingham  
TAYLER D. BINGHAM  
Nevada Bar No. 15870

By: /s/ Douglas R. Rands  
DOUGLAS R. RANDS, Bar No. 3572  
Senior Deputy Attorney General

*Attorneys for Plaintiff*

*Attorneys for Defendants*

\* \* \*

**IT IS SO ORDERED.**

  
\_\_\_\_\_  
DANIEL J. ALBRECHTS  
UNITED STATES MAGISTRATE JUDGE

DATED: 1/14/2025